

The Hon. S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL MOORE-HILL

Defendant.

CASE NO. MJ23-31

COMPLAINT

BEFORE United States Magistrate Judge S. Kate Vaughan, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Damage or Attempted Damage to United States Government Property)

On or about February 1, 2022, in King County, within the Western District of Washington, MICHAEL MOORE-HILL did willfully injure and commit depredation against property of the United States, to wit: the United States Courthouse, located at 700 Stewart Street, Seattle, Washington, 98101, and the damage to said property exceeded \$1,000.

All in violation of Title 18, United States Code, Section 1361.

COUNT 2

(Damage or Attempted Damage to United States Government Property)

On or about May 15, 2022, in King County, within the Western District of Washington, MICHAEL MOORE-HILL did willfully injure and commit depredation against property of the United States, to wit: the United States Courthouse, located at 700 Stewart Street, and the damage to said property exceeded \$1,000.

All in violation of Title 18, United States Code, Section 1361.

The undersigned, Mike Hilden, complainant being duly sworn states:

1. I am employed as a Special Agent (SA) with the Federal Protective Service (FPS) and have been employed by FPS since July 2017. I have participated in several investigations relating to the protection of federal facilities and personnel. I am currently assigned to Region 10 in Auburn, Washington, as a general crimes agent. From May 2010 to August 2015, I was a Game Warden with the Muckleshoot Indian Tribe enforcing tribal hunting regulations. Before that, I was an Inspector with FPS from April 2004 to May 2010. During this time with FPS, I enforced federal and state laws on federal properties. From May 1998 to April of 2004, I was a Deputy Sheriff with the Pierce County Sheriff's Department, enforcing Washington State laws and county codes. From April 1996 to April of 1998, I was a police officer with the Veterans Affairs Police Department in Seattle, WA. I started my law enforcement career in 1990 in the Army with the military police.

2. I graduated from several police academies, the Veterans Affairs Police Academy, Washington State Criminal Justice Training Academy, Uniformed Police Training Program, and the Criminal Investigation Training Program. I received my Associates Degree in Integrated Studies from Cascadia Community College in 2006. As a result of my training and experience as an FPS Special Agent, I am familiar with the federal criminal laws.

3. As an FPS Special Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

5. The United States Courthouse, 700 Stewart Street, Seattle, Washington, 98101 (SEATTLE U.S. COURTHOUSE), is located within the Western District of Washington. The United States Courthouse is a federal courthouse and is property of the United States.

6. The William Kenzo Nakamura United States Courthouse, 1010 5th Avenue (NAKAMURA U.S. COURTHOUSE), Seattle, Washington, 98104, is located within the Western District of Washington. The Nakamura United States Courthouse is a federal courthouse and is property of the United States.

7. On February 1, 2022, Court Security Officer (CSO) Kevin Johnson witnessed MOORE-HILL break a window at the SEATTLE U.S. COURTHOUSE. CSO Johnson saw MOORE-HILL throw a rock twice at a glass window located on the northwest corner of the building. The first rock did not break the window and bounced back to MOORE-HILL. MOORE-HILL picked up the rock a second time and threw it against the window causing the window to break. CSOs Christopher Hughes, Luther Russell, and Johnson confronted MOORE-HILL and another rock fell from his jacket pocket. MOORE-HILL was detained, and FPS was called. FPS Inspector Jason Morales responded to the incident and spoke with MOORE-HILL. MOORE-HILL spontaneously stated, "I threw the rock at the window to get attention. I did it for my safety because the police are following me and harassing me. I did not wish to hurt anyone." MOORE-HILL was cited and released. The cost to repair the window was \$1,634.16.

1 8. On February 1, 2022, photos were taken of MOORE-HILL during his
2 detainment inside of the SEATTLE U.S. COURTHOUSE. MOORE-HILL was wearing a
3 black hoodie, a black Carhart jacket, blue jeans, and distinctive black and white tennis
4 shoes. These tennis shoes have black laces, a black stripe along the toe leading into a
5 black triangle, and white rubber on the bottom. The following photo shows MOORE-
6 HILL'S attire:



18 9. On April 14, 2022, at 11:50 p.m., a subject matching the height and build of
19 MOORE-HILL was caught on security footage approaching the front the SEATTLE U.S.
20 COURTHOUSE. The subject, who appears to be MOORE-HILL, took a rock out of his
21 pocket and threw it at a courthouse window, shattering it. The subject then ran down the
22 wheelchair ramp and out of view of the security cameras. Based on the subject's height,
23 build, shoes and manner of pulling a rock from his pocket and throwing the item at the
24 courthouse window, I have reason to believe this individual was MOORE-HILL. Two
25 images captured from security video show MOORE-HILL'S actions:

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10. On May 15, 2022, at approximately 8:40 a.m., Seattle Police Department Officers responded to a report of vandalism at the SEATTLE U.S. COURTHOUSE. Officers contacted MOORE-HILL. MOORE-HILL was standing on top of the stairs and west of the entrance of the courthouse. Officers observed one of the courthouse windows had been broken. Officers asked MOORE-HILL if he had broken the window and he stated, “no” and walked away. A witness in the area told Officers she had seen MOORE-HILL break the window to the courthouse. Officers placed MOORE-HILL in handcuffs, and he was read his *Miranda* rights. MOORE-HILL denied he had broken the window. MOORE-HILL was booked into the King County Jail. The cost to repair the window was \$2,677.49.



11. On July 7, 2022, at 8:32 a.m., FPS Inspector Coby Parmenter responded to a reported vandalism at the SEATTLE U.S. COURTHOUSE. CSO Mike Ware informed Inspector Parmenter he was told MOORE-HILL had broken a window on the southeast corner of the building by throwing several rocks into it. MOORE-HILL had since left the area and was last seen walking eastbound on Stewart Street. Based on the height and appearance of the man captured on video, I believe this suspect to be MOORE-HILL. The cost to repair the window was \$12,670.15. MOORE-HILL was captured on video surveillance:



1 12. While investigating the broken window at the SEATTLE U.S.
2 COURTHOUSE, CSO Ware told Inspector Parmenter MOORE-HILL had also broken a
3 window earlier in the day at the NAKAMURA U.S. COURTHOUSE. Video surveillance
4 captured MOORE-HILL the morning of July 7, 2022, at approximately 4:37a.m.. The
5 video showed Moore-Hill in the same clothing and wearing a backpack. I reviewed the
6 security footage and it showed, an individual I believe to be, MOORE-HILL walk west
7 on the Seneca Street sidewalk, adjacent to the courthouse. MOORE-HILL is seen
8 throwing a rock at a window located on the northeast corner of the building. The rock
9 strikes and breaks the window. MOORE-HILL continues to walk west on Seneca Street
10 and disappears out of camera view. The cost to repair the window was \$1,328.17. A
11 screen shot of the video surveillance was captured:



21 13. On July 15, 2022, FPS Commander Shaunn McClellan was contacted by
22 the United States Deputy Marshall (SDM) Andy Wong. USDM Wong told Commander
23 McClellan, MOORE-HILL had damaged a security camera at the SEATTLE U.S.
24 COURTHOUSE . The camera had been broken the day before, on July 14, 2022, at
25 approximately 6:39 p.m.. Based on the appearance of the individual captured on video, I
26 believe the man to be MOORE-HILL. Video surveillance captured MOORE-HILL'S
27 actions:
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Based on the above facts, I respectfully submit there is probable cause to believe that MICHAEL C. MOORE-HILL did knowingly and intentionally violate Damage or Attempted Damage to United States Government Property in violation of Title 18, United States Code, Section 1361 on February 1, 2022, and May 15, 2022.

MICHAEL B HILDEN

Digitally signed by
MICHAEL B HILDEN
Date: 2023.01.19
15:04:49 -08'00'

MIKE HILDEN, SPECIAL AGENT
FEDERAL PROTECTIVE SERVICE

The above-named agent provided a sworn statement attesting to the truth of the foregoing Complaint and Affidavit by telephone, pursuant to the Federal Rules of Criminal Procedure, Rule 4.1 on this 20th day of January 2023. Based on the Complaint and Affidavit, the Court hereby finds there is probable cause to believe MICHAEL MOORE-HILL committed the offenses set forth in the Complaint.

DATED this 20th day of January 2023.

S. KATE VAUGHAN
United States Magistrate Judge